

A

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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PAUL T. PAPADAKIS,

Plaintiff,

-vs-

CSX TRANSPORTATION, INC.,

Defendant,

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CIVIL ACTION NO.
04-30189-MAP

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PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS
PURSUANT TO RULE 34

Now comes the plaintiff in the above-entitled action, pursuant to Rule 34 of the Federal Rules of Civil Procedure, and requests the following documents from the defendant:


1. Accident Reports, Employee Personal Injury Investigation Reports, Personal Injury Reports, Inspection Reports and Investigation Reports concerning the plaintiff's accident, including but not limited to:
 - a. Personal Injury/Occupational Illness Report Form PI-1;
 - b. Employee's Incident Report, Form PI-1A RMP;
 - c. CSX PI-83-EMT Employee Incident/Injury Root Cause Analysis Report;
 - d. Preliminary Personal Injury Report
2. The signed or otherwise adopted or approved statements or oral recordings of oral statements of the plaintiff.

25. Copies of any and all records, reports, memorandum, notes, statements, correspondence, photographs, drawings, diagrams, tape recordings or transcripts, video tape recordings and all other documents or things in the defendant's possession concerning surveillance of the plaintiff which may have taken place during the period between June 13, 2001 through to the present by any agents, servants, employees or contractors engaged by the defendant.

26. Permission to enter the property of the Defendant to photograph the scene of the Plaintiff's accident and any and all equipment, tools or vehicles involved in the Plaintiff's accident.

PAUL T. PAPADAKIS
By his attorneys,

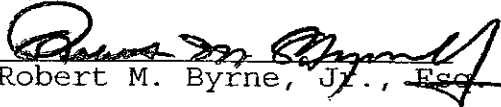
DATE: 10/15/04


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Robert T. Naumes
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THORNTON & NAUMES LLP
100 Summer St., 30th Fl.
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(617) 720-1333

Certificate of Service

I hereby certify that on October 15, 2004, I served the foregoing Plaintiff's Request For Production Of Documents Pursuant To Rule 34 by mailing a copy of same, postage prepaid, to:

Michael B. Flynn, Esquire
Bethany M. Machacek, Esquire
Flynn & Associates, P.C.
400 Old Crown Colony Drive, Suite 200
Quincy, MA 02169


Robert M. Byrne, Jr., Esq.

FELA\PAPADAKIS\RULE 34